

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

JOHNNY M. HUNT,
Plaintiff,

v.

SOUTHERN BAPTIST CONVENTION;
GUIDEPOST SOLUTIONS LLC; and
EXECUTIVE COMMITTEE OF THE
SOUTHERN BAPTIST CONVENTION,

Defendants.

Case No. 3:23-cv-00243
Judge Richardson
Magistrate Judge Frensley

**RESPONSES AND OBJECTIONS OF DEFENDANT GUIDEPOST SOLUTIONS
LLC TO PLAINTIFF JOHNNY M. HUNT'S SECOND
SET OF INTERROGATORIES**

Defendant Guidepost Solutions LLC ("Guidepost"), by and through its attorneys, Riley & Jacobson, PLC and Mintz & Gold LLP, hereby responds to Plaintiff Johnny M. Hunt's Second Set of Interrogatories as follows:

GENERAL RESPONSES AND OBJECTIONS

Guidepost incorporates by reference the General Objections set forth in Plaintiff Johnny M. Hunt's First Set of Interrogatories and repeats them as if fully set forth herein.

RESPONSES

INTERROGATORY NO. 1.

With respect to the "contemporary audio recordings" referred to in the March 13, 2023 letter from Steven G. Mintz to Robert D. MacGill, (a) who has (or had) possession of the recordings, (b) whose voices are (or were) contained on the recordings; (c) what is (or was) the format of the recordings; (d) what is (or was) the

subject matter of the recordings; (e) when were the recordings made; (f) who made the recordings; (g) if the recordings no longer exist, when such recordings ceased to exist, what happened to the recordings, and who caused them to cease to exist.

Response:

Guidepost refers Plaintiff to the Report, which details that the survivor's husband provided Guidepost with records of sessions with the counselor referred to in the Report, Roy Blankenship, which included some audio recordings of the counseling. In further response to this Interrogatory, Guidepost is only in possession of the audio recordings that it received from the survivor's husband, which speak for themselves, and will provide copies of those recordings in response to Plaintiff's Second Set of Document Requests.

Respectfully submitted,

s/ John R. Jacobson

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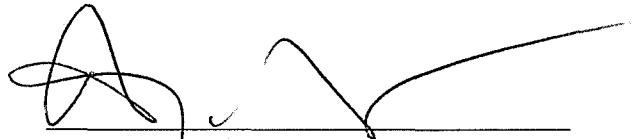
Attorneys for Guidepost Solutions LLC

VERIFICATION

1. I, Anthony M. Collura, am Chief Operating Officer and Chief Legal Officer at Guidepost Solutions LLC, a defendant in the above-entitled action.

2. I have read the Responses and Objections of Defendant Guidepost Solutions LLC ("Guidepost") to Plaintiff Johnny M. Hunt's Second Set of Interrogatories (the "Responses") and know the contents thereof. Based upon the records maintained by Guidepost, and/or on information furnished to me by employees of Guidepost, I declare under 28 U.S.C. § 1746 under penalty of perjury that the foregoing answers to those interrogatories are true according to the best of my knowledge, information, and belief.

Executed at New York, New York on the 17th day of August, 2023.



Anthony M. Collura

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served by electronic mail on the following:

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on this 17th day of August, 2023.

s/John R. Jacobson